

UNITED STATES DISTRICT COURT

for the
District of New Jersey

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. 24-mj-13089 (LDW)

Fort Lee, New Jersey
07024

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the _____ District of _____ New Jersey _____, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. §§ 371, 666, 1343, 1346, and 1349, and 52 U.S.C. § 30121	theft of federal funds, bribery involving federal funds, wire fraud, honest services fraud, campaign contributions by foreign nationals, and conspiracy

The application is based on these facts:

See Attachment C

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
_____ telephone _____ (specify reliable electronic means).

Date: 05/17/2024

/s Hon. Leda Dunn Wettre (By Agent with Authorization)

Judge's signature

City and state: District of New Jersey

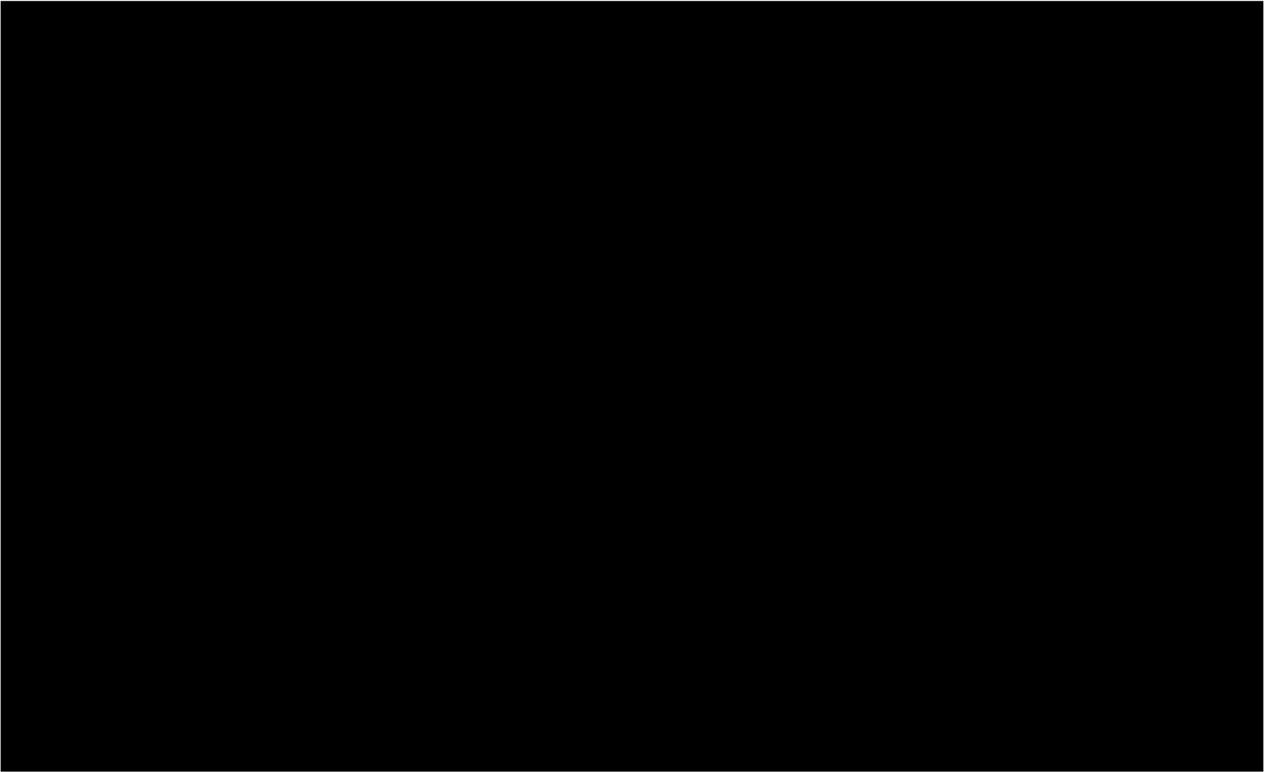
Hon. Leda Dunn Wettre, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

Property to Be Searched

The Subject Premises is particularly described as a two-bedroom condominium unit, numbered [REDACTED] and located in a high-rise condominium building located at [REDACTED] Fort Lee, NJ 07024. The Subject Premises is accessed by entering the lobby of [REDACTED] through the front entrance (depicted below, on the left) and using the elevators or stairs to reach the [REDACTED] floor. Once there, the door to the Subject Premises (depicted below, on the right) is blue with a metallic gold-colored handle, [REDACTED] [REDACTED] on a gold placard in the center of the door at eye level.



ATTACHMENT B

A. Evidence, Fruits, and Instrumentalities of the Subject Offenses

The items to be seized from the Subject Premises consist of five iPhones: (1) bearing IMEI¹ 35720209276062 and/or IMSI² 310410155988969; (2) bearing IMEI 35324410436065 and/or IMSI 310410251030203; (3) bearing IMEI 35390959611806 and/or IMSI 310280022356011; (4) bearing IMEI 35325307771107 and/or IMSI 310410861866143; and (5) bearing IMEI 35355956330430 and/or IMSI 310280074221474. Law enforcement agents executing the requested warrant may examine cellphones found within the Subject Premises only to the extent necessary to view the IMEI and/or IMSI. Law enforcement may not otherwise examine the contents of any cellphones without further judicial authorization.

¹ “IMEI,” or International Mobile Equipment Identity, is a unique number used to identify certain types of cellphones.

² “IMSI,” or International Mobile Subscriber Identity, is a unique number that mobile network operators use to recognize individual subscribers.

ATTACHMENT C

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN THE MATTER OF THE SEARCH OF : Hon. Leda Dunn Wettre, U.S.M.J.
THE PREMISES LOCATED AT [REDACTED] :
[REDACTED] FORT : Mag. No. 24-mj-13089 (LDW)
LEE, NJ 07024, AS MORE :
PARTICULARLY DESCRIBED IN : **TO BE FILED UNDER SEAL**
ATTACHMENT A :

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Special Agent [REDACTED] being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2019. I am currently assigned to a public corruption squad of the New York Field Office, where, among other things, I investigate crimes involving illegal campaign contributions, theft of federal funds, and bribery. Through my training and experience, I also have become familiar with some of the ways in which individuals use smart phones and electronic communications, including social media, email, and electronic messages, in furtherance of their crimes, and have participated in the execution of search warrants involving electronic evidence.

2. This Affidavit is respectfully submitted, pursuant to Rule 41 of the Federal Rules of Criminal Procedure, in support of the Government’s application for a warrant to search the premises located at [REDACTED] [REDACTED]

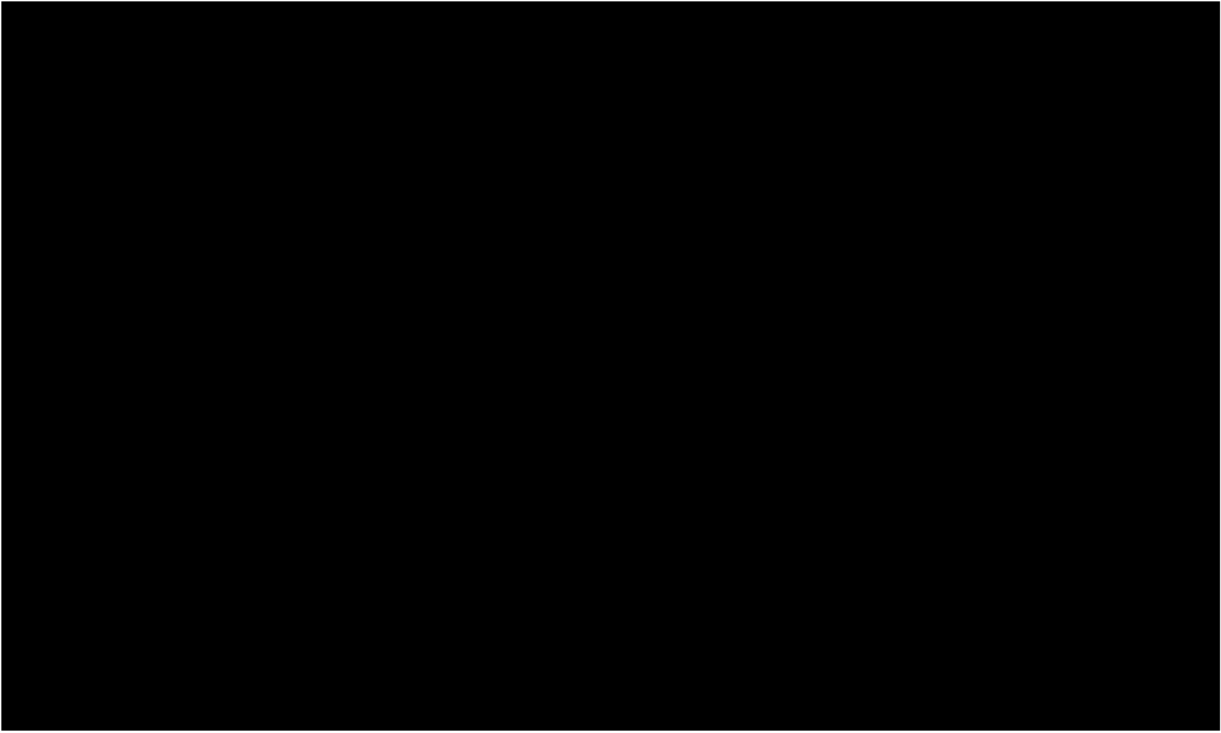
Fort Lee, NJ 07024, as more particularly described in Attachment A (the “**Subject Premises**”), for the things described in Attachment B.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that the **Subject Premises** contains evidence, fruits, and instrumentalities of violations of (i) 18 U.S.C. §§ 371 and 666 (theft of federal funds, bribery involving federal funds, and conspiracy to commit both), (ii) 18 U.S.C. §§ 1343, 1346 and 1349 (wire fraud, honest services fraud, and attempt and conspiracy to commit both), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same) (collectively, the “Subject Offenses”) committed, being committed, and that will continue to be committed by Eric Adams and [REDACTED] [REDACTED] among others.

4. This affidavit is based upon my personal knowledge; my review of documents, recordings, and other evidence; my conversations with other law enforcement personnel; and my training, experience, and advice received concerning the use of electronic devices in criminal activity and the forensic analysis of electronically stored information (“ESI”). Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

THE SUBJECT PREMISES

5. The **Subject Premises** is particularly described as a two-bedroom condominium unit, numbered [REDACTED] and located in a high-rise condominium building located at [REDACTED] Fort Lee, NJ 07024. The **Subject Premises** is accessed by entering the lobby of [REDACTED] through the front entrance (depicted below, on the left) and using the elevators or stairs to reach the [REDACTED] floor. Once there, the door to the **Subject Premises** (depicted below, on the right) is blue with a metallic gold-colored handle, marked [REDACTED] on a gold placard in the center of the door at eye level.



PROBABLE CAUSE

A. Probable Cause Regarding the Subject Offenses

6. Since in or about August 2021, the FBI and the Office of the United States Attorney for the Southern District of New York have been investigating the receipt of so-called “straw” donations¹ by the 2021 and 2025 New York City mayoral campaigns of New York City Mayor Eric Adams (“Adams”) (the “Adams Campaigns”), including certain straw donations that were funded by and/or made at the direction of foreign government officials and other foreign persons. As detailed more fully below and in the attached exhibits, [REDACTED] [REDACTED] Turkey’s Consul General in New York, was involved in facilitating at least one fundraiser at which straw donations were made. [REDACTED] and others associated with him, also arranged free or steeply discounted luxury travel for Adams and certain of his associates, including [REDACTED] [REDACTED] [REDACTED] Adams’s longtime romantic partner.

7. This warrant seeks permission to search a premises (the **Subject Premises**) used by [REDACTED] and, at times, Adams, for five iPhones, specifically:

¹ A straw, or “conduit,” donation occurs when a donation to a political campaign is made in the name of one donor, but the funds in question in fact belong to a different person.

(1) an iPhone bearing IMEI² 35720209276062 and/or IMSI³ 310410155988969;
 (2) an iPhone bearing IMEI 35324410436065 and/or IMSI 310410251030203;
 (3) an iPhone bearing IMEI 35390959611806 and/or IMSI 310280022356011;
 (4) an iPhone bearing IMEI 35325307771107 and/or IMSI 310410861866143;
 and (5) an iPhone bearing IMEI 35355956330430 and/or IMSI 310280074221474 (together, the “**Subject Devices**”). The **Subject Devices** were used by [REDACTED] during the period in which there is probable cause to believe the Subject Offenses were committed. As detailed below, there is probable cause to believe the **Subject Devices** are located within the **Subject Premises**, and contain evidence of the Subject Offenses, including, among other things: (1) evidence that Adams, [REDACTED] or those acting at their behest, received a request by [REDACTED] to direct the New York City Department of Education to admit [REDACTED] son to a selective New York City public school, and (2) evidence that Adams and [REDACTED] among others, received free or steeply discounted luxury travel arranged by [REDACTED] and those associated with him.

8. As part of this investigation, law enforcement has obtained various warrants for electronic evidence. On November 1, 2023, the Honorable James B. Clark III, United States Magistrate Judge for the District of New Jersey, issued a

² “IMEI,” or International Mobile Equipment Identity, is a unique number used to identify certain types of cellphones. I understand that, in addition to the 14 digits listed for each IMEI here, many IMEIs may appear in the phones with which they are associated as containing one or more additional digits that may change over time. Only the first 14 unique digits are included here.

³ “IMSI,” or International Mobile Subscriber Identity, is a unique number that mobile network operators use to recognize individual subscribers.

warrant authorizing a search of the home of [REDACTED] for evidence of the Subject Offenses, including any electronic devices used by [REDACTED]. See Mag. No. 23-mj-12234 (JBC). The warrant and supporting affidavit are attached hereto as Exhibit A and incorporated by reference herein.

9. As detailed more fully in the attached affidavit, this investigation has revealed, in substance and in part, the following:

a. On or about May 7, 2021, employees of [REDACTED] ([REDACTED] a construction company that operates in New York City, made donations to the 2021 Adams Campaign in approximately the same amount as monies paid to each of the employees by [REDACTED] on April 28, 2021.⁴ (See, e.g., Ex. A ¶¶ 9-11).

b. Many of [REDACTED] employees are of Turkish origin.⁵ (See, e.g., Ex. A ¶ 6).

c. The Adams Campaigns cultivated a relationship with [REDACTED] as well as the broader Turkish community, beginning at least in 2018. (See, e.g., Ex. A ¶¶ 16, 19).

⁴ Out of eleven donations from [REDACTED] employees made at the fundraiser, the co-owner of [REDACTED] who organized the fundraiser did not receive a [REDACTED] reimbursement check, one donor received \$50 more from [REDACTED] than the donor donated to the 2021 Adams Campaign, and one [REDACTED] employee's wife donated, while the employee himself received the [REDACTED] reimbursement check.

⁵ Certain earlier affidavits in this investigation stated that [REDACTED] was affiliated with a larger Turkish corporation. Law enforcement has since interviewed several [REDACTED] employees who have stated, in substance and in part, that although [REDACTED] was started by personnel formerly employed by that larger Turkish corporation, the two entities have no formal connection.

d. [REDACTED] was involved in fundraising for the Adams Campaigns, including arranging the fundraiser where the [REDACTED] straw donations were made, and communicated about fundraising with members of Adams's staff.⁶ (See, e.g., Ex A. ¶¶ 12(a), 12(b), 13, 16).

e. Turkish national [REDACTED] was involved in fundraising for the Adams Campaigns and attempted, in agreement with members of Adams's staff, to donate funds from Turkish nationals to the Adams Campaigns and communicated about fundraising with members of Adams's staff.⁷ (See, e.g., Ex. A ¶¶ 19-24).

f. Adams communicated with members of his staff about fundraising in the Turkish community and the potential provision of benefits to the Consul General. (See, e.g., Ex. A ¶¶ 16(c), 16(j)).

⁶ Certain earlier affidavits in this investigation described [REDACTED] and [REDACTED] as staff of the Adams Campaigns. Counsel for Adams has since told the Government that, at least with respect to the 2021 Adams Campaign, [REDACTED] was a volunteer and [REDACTED] was a volunteer before becoming an employee of the Campaign. As used herein, "Adams's staff" is an inclusive term referring to persons who have worked for Adams (whether as Brooklyn Borough President or Mayor) and/or the Adams Campaigns.

⁷ In addition to other such donations, [REDACTED] assisted in coordinating straw donations from employees of [REDACTED] ("[REDACTED] a Washington, D.C.-based university partnered with a Turkish university named [REDACTED] [REDACTED] Records maintained by the New York City Campaign Finance Board indicate that on September 27, 2021, five employees of [REDACTED] donated \$2,000 each to the 2021 Adams Campaign. According to public reporting, the 2021 Adams Campaign returned the [REDACTED] donations approximately 17 days later, claiming that "[t]he campaign had raised more money than it could spend," but as one article notes, "campaign records show [the 2021 Adams Campaign] accepted and did not return other contributions in the weeks that followed." See <https://www.thecity.nyc/2023/11/03/fbi-probe-eric-adams-campaign-turkey>.

g. Adams and members of his staff intervened in at least one matter within the purview of the New York City government to obtain favorable action for the Consul General; specifically, obtaining a Temporary Certificate of Occupancy (“TCO”) for the official opening of a building associated with the Turkish Consulate in New York in time for a visit by Turkey’s president in 2021. (See, e.g., Ex. A. ¶¶ 25-29).

h. [REDACTED] was one of Adams’s key intermediaries to the Turkish community and worked in the Special Counsel’s office of the Brooklyn Borough President when Adams was Brooklyn Borough President, was involved with the Adams Campaigns, and most recently worked in the Mayor’s Office for International Affairs. During the relevant time period, [REDACTED] had regular contact both with Turkish consular officials and with [REDACTED] was personally involved with the May 7, 2021 Adams fundraiser held by [REDACTED] at which the straw donations were made; and was personally involved in the exchange of other benefits between Adams and those associated with him and the Consul General and those associated with him. (See, e.g., Ex. A ¶¶ 7, 13-18).

[REDACTED] [REDACTED]

10. I know based on, among other sources, public reporting, that [REDACTED]

[REDACTED] is Adams’s long-term romantic partner.⁸ In addition, based on public reporting,

⁸ See, e.g., Sandra E. Garcia, *The ‘Swagger Mayor’ Attends His First Met Gala*, N.Y. Times, May 3, 2022, <https://www.nytimes.com/2022/05/03/style/met-gala-party-eric-adams.html> (“Mayor Eric Adams of New York was . . . accompanied by his girlfriend, [REDACTED] whom he introduced as his ‘other half.’”).

██████ was Senior Adviser to a Deputy Chancellor of the New York City Department of Education (“NYCDOE”).⁹

11. I have reviewed the contents of an iCloud account and an Apple iPhone used by ██████ obtained pursuant to search warrants, including text messages exchanged between ██████ and ██████ In February and March 2023, ██████ ██████ and ██████ exchanged the following text messages:

⁹ See, e.g., <https://www.cityandstateny.com/personality/2023/06/eric-adams-friends-and-family-plush-city-jobs/387338/>.

<u>Date</u>	<u>From</u>	<u>To</u>	
2/13/2023	████	████	Hi █████ Here is the contact information for the Consul General of Turkey +1 █████ 4260 █████
2/13/2023	████	████	Thank you so much █████ I will share the number with █████ when I see him. Please save my personal cell and I will also save your personal cell number too. Warmly, █████
2/13/2023	████	████	Thank you, █████ Appreciate all your help
3/10/2023	████	████	Good evening █████ Such a pleasure to meet you today great personality and full of positive energy
3/10/2023	████	████	Here is the information for the █████ son Student Name: █████ Student ID: █████ Current School: █████ 5th Grade Looking to get into M.S. 255 Salk School of Science Thank you 🤝
3/12/2023	████	████	Loved "Good evening █████ Such a pleasure to meet you t..."
3/12/2023	████	████	████ it was so good seeing you on Friday and meeting with the team. Thank you for your kind words. Much appreciated. Talk soon. 🙏
3/28/2023	████	████	Hi █████ Hope you are doing well Sorry to bother you, but is there any update regarding the Turkish Consul General's request? Or do you need additional information about the student

Based on my training and experience and involvement in this investigation, I believe that in this conversation ██████ asked ██████ to assist ██████ son in gaining admittance to M.S. 255 Salk School of Science, a highly sought-after New York City public middle school within the purview of NYCDOE, and that ██████ agreed to contact ██████ ██████ Director of Intergovernmental Affairs for NYCDOE. The conversation also indicates that ██████ met with ██████¹⁰

12. I have reviewed records from ██████ which show, among other things, that between 2016 and 2021 ██████ traveled with Adams to or through Turkey on approximately four occasions and on each of those occasions, ██████ received complimentary upgrades worth several thousand dollars. Based on open-source information, I know that a sovereign wealth fund owned by the Turkish Government owns slightly less than 50% of the shares of ██████ ██████ and is the airline's single largest shareholder.¹¹ I have also reviewed messages between Adams, ██████ ██████ and others showing that ██████ and an officer of ██████ operating in conjunction with ██████ have discussed the provision of free or discounted travel benefits to Adams and those associated with him, including ██████ (See, e.g., Ex. A ¶¶ 17-18).

13. On February 20, 2024, the Honorable Sarah L. Cave, United States Magistrate Judge for the Southern District of New York, issued a warrant

¹⁰ I understand that records maintained by the NYCDOE indicate that ██████ son was not enrolled at Salk School of Science.

¹¹ <https://investor.████████.com/en/████████shareholding-structure>.

authorizing the seizure and search of two iCloud accounts, one of which is used by [REDACTED] (the “[REDACTED] iCloud”). The warrant and supporting affidavit are attached hereto as Exhibit B and incorporated by reference herein. Based on my review of the contents of the [REDACTED] iCloud obtained pursuant to that warrant, the [REDACTED] iCloud contains, among other things:

a. The messages discussed in ¶ 11 above, reflecting a request from [REDACTED] that his son be placed in the Salk School of Science.

b. Evidence of [REDACTED] travel, with Adams, on three trips¹² where Adams and/or [REDACTED] received free travel upgrades from [REDACTED] such as photographs of Adams and [REDACTED] during that travel, and messages [REDACTED] sent and received about that travel. These photographs and messages appear to be of the type commonly taken or sent using a cellphone.

c. Evidence that [REDACTED] encouraged persons she communicated with to use Signal, an electronic messaging application that can be used to conceal, encrypt, or automatically delete messages, shortly after this investigation became publicly known. Specifically, on November 2, 2023, this investigation became publicly known when FBI agents executed several search warrants, some of which drew media attention. On November 4, 2023, [REDACTED] exchanged messages about the execution of one of those search warrants with two individuals whom [REDACTED] had previously texted with. [REDACTED] also sent each

¹² The first of the four trips discussed above in paragraph 12 occurred in 2016, which is outside the date range for which the warrant for the [REDACTED] iCloud authorized the seizure of data.

individual a link to install Signal, which, according to the text messages, at least one of the individuals installed. Based on my experience in this investigation, I know that messages sent using Signal are often not found on a Signal user's iCloud, but can often be found on the cellphone from which the messages were sent.

B. Probable Cause Regarding the Subject Premises

14. New Jersey Motor Vehicle Commission, credit card, and telephone records list the **Subject Premises** as [REDACTED] residence. Searches of law enforcement databases have not revealed any other residences also used by [REDACTED]

15. Telephone records and the data in the [REDACTED] iCloud reflect that the **Subject Devices** were used by the user of the [REDACTED] iCloud (that is, [REDACTED]). I am also aware, based on telephone records and electronic communications that have been obtained in the course of this investigation, that [REDACTED] uses a particular cellphone number (the "[REDACTED] Number"), which is also associated with the [REDACTED] iCloud. According to telephone records, from at least in or about 2016 to the present, each of the **Subject Devices** has, in succession, used the [REDACTED] Number, consistent with the common practice of a person possessing a cellphone, obtaining a newer phone, and then transferring their phone number to that newer phone. As discussed above, from before 2016 to at least in or about March 2023, there is probable cause to believe that [REDACTED] used cellphones, such as the **Subject Devices**, to create and/or store evidence of the Subject Offenses, including photographs and messages evincing free travel

benefits provided by [REDACTED] to Adams and [REDACTED] and a request from [REDACTED] that New York City perform an official act at [REDACTED] request.

16. Based on my training and experience, persons generally keep their cellphones accessible, meaning that if a person is home, those devices are likely to be in their residence. In addition, persons who upgrade their cellphone often retain and store their older device in their residence, as they would with any other personal possession.

17. For the reasons set forth above, there is probable cause to believe that the **Subject Devices** will be found within the **Subject Premises** and that they will contain evidence of the Subject Offenses. In addition:

a. Cellphones can be used store documents, including emails, text messages, previous electronic chats, and financial documents like bank statements and travel expenditure. Document attachments to communications can be saved intentionally or as a result of a cellphone's operating system or web browser to an electronic device, including a cellphone. Moreover, and more generally, users of cellphones who are engaged in the commission of the Subject Offenses often store documents relevant to that activity on their devices, and also maintain notes of meetings and telephone calls on their devices. Such documents can include, but are not limited to, Microsoft Word and PDF documents, drafts, scans, bank statements received from financial institutions, and government filings.

b. Cellphones can contain photographs and videos of meetings—such as those discussed above—and documents, audio recordings of telephone calls and meetings, and screenshots of text messages.

c. Electronic files, or remnants of those files, downloaded to a cellphone can be stored for years at little or no cost. Even when such files have been deleted, they can be recovered months or years later using readily available forensics tools. When a person “deletes” a file on a cellphone the data contained in the file does not actually disappear; rather, that data remains on the storage medium and within the device unless and until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the device that is not allocated to an active file or that is unused after a file has been allocated to a set block of storage space—for long periods of time before they are overwritten. In addition, a device’s operating system may also keep a record of deleted data in a “swap” or “recovery” file. Similarly, files that have been viewed via the Internet are automatically downloaded into a temporary Internet directory or “cache.” The browser typically maintains a fixed amount of electronic storage medium space devoted to these files, and the files are only overwritten as they are replaced with more recently viewed Internet pages. Thus, the ability to retrieve “residue” of an electronic file from a cellphone depends less on when the file was downloaded or viewed than on a particular user’s operating system, storage capacity, and cellphone habits.

d. Additionally, a person can transfer data from an old cellphone, to a new device, including, for example, mail, contacts, calendars, photos and videos,

books and pdfs, call logs, and text messages. For individuals who regularly change or upgrade their devices, including cellphones, it is common to transfer electronic records, such as emails, contacts, calendars, photos and videos, books and pdfs, call logs, and text messages from the old phone to a new phone. Individuals can transfer data in a few ways, including in a cellphone provider or Apple store, through a personal computer containing a backup, or through an iCloud backup. Doing so does not typically delete or remove data from the older cellphone, but rather simply duplicates it on the newer device. Accordingly, data found on one electronic device is often found on other devices used by the same person.

e. Accordingly, there is probable cause to believe that the **Subject Devices** will be found in the **Subject Premises**, and that the **Subject Devices** will contain evidence of the Subject Offenses.¹³

CONCLUSION

18. I submit that this affidavit provides probable cause for a warrant to search the **Subject Premises** described in Attachment A and to seize the evidence, fruits, and instrumentalities of the Subject Offenses, more fully described in Attachment B.

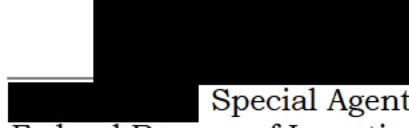
¹³ Law enforcement agents executing the requested warrant may examine cellphones found within the **Subject Premises** only to the extent necessary to view the IMEI and/or IMSI. Law enforcement will not otherwise examine the contents of any cellphones without obtaining a further search warrant permitting them to do so.


REQUEST FOR SEALING

19. The existence of this ongoing criminal investigation is publicly known, but its full extent and scope, including some of the witnesses and evidence discussed in this affidavit, have not been publicly revealed. Premature public disclosure of this affidavit could cause [REDACTED] and her associates and co-conspirators to destroy evidence not yet gathered by law enforcement, much of which likely exists in electronic or paper forms that can be readily destroyed. In addition, disclosure of this affidavit could cause [REDACTED] associates or co-conspirators to believe that their arrest is imminent, triggering their flight. This is especially concerning given that some of her co-conspirators have significant ties abroad (as partly discussed in the exhibits attached to this affidavit), and regularly travel abroad. For these reasons, I respectfully request that this affidavit and all papers submitted herewith be maintained under seal until the Court orders otherwise, except that the Government be permitted without further order of this Court to provide copies of the warrant and affidavit as need be to personnel assisting it in the investigation and prosecution of this matter,

and to disclose those materials as necessary to comply with discovery and disclosure obligations in any prosecutions related to this matter.

Respectfully submitted,


Special Agent
Federal Bureau of Investigation

SA  attested to this Affidavit
by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A)
on May 17, 2024

/s Hon. Leda Dunn Wettre (By Agent with Authorization)

HONORABLE LEDA DUNN WETTRE
United States Magistrate Judge

EXHIBIT A
[23-mj-12234]

EXHIBIT B
[24 MAG 737]

UNITED STATES DISTRICT COURT

for the
District of New JerseyIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Fort Lee, New
Jersey 07024

Case No. 24-mj-13089 (LDW)

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the _____ District of _____ New Jersey
(identify the person or describe the property to be searched and give its location):

See Attachment A

The search and seizure are related to violation(s) of (insert statutory citations):

(i) 18 U.S.C. §§ 371 and 666 (theft of federal funds, bribery involving federal funds, and conspiracy to commit both), (ii) 18 U.S.C. §§ 1343, 1346 and 1349 (wire fraud, honest services fraud, and attempt and conspiracy to commit both), and (iii) 18 U.S.C. § 371 and 52 U.S.C. § 30121 (campaign contributions by foreign nationals and conspiracy to commit the same)

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before May 31, 2024 (not to exceed 14 days)☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the Honorable Leda Dunn Wettre
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)☐ for _____ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of _____Date and time issued: May 17, 2024 at 6:45 PM/s Hon. Leda Dunn Wettre (By Agent with Authorization)
Judge's signatureCity and state: District of New JerseyHon. Leda Dunn Wettre, U.S. Magistrate Judge
Printed name and title

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

Return

Case No.:

24-mj-13089 (LDW)

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.


Date: _____

*Executing officer's signature*_____
Printed name and title

ATTACHMENT A

Property to Be Searched

The Subject Premises is particularly described as a two-bedroom condominium unit, numbered [REDACTED] and located in a high-rise condominium building located at [REDACTED] Fort Lee, NJ 07024. The Subject Premises is accessed by entering the lobby of [REDACTED] through the front entrance (depicted below, on the left) and using the elevators or stairs to reach the [REDACTED] floor. Once there, the door to the Subject Premises (depicted below, on the right) is blue with a metallic gold-colored handle, marked [REDACTED] on a gold placard in the center of the door at eye level.



ATTACHMENT B

A. Evidence, Fruits, and Instrumentalities of the Subject Offenses

The items to be seized from the Subject Premises consist of five iPhones: (1) bearing IMEI¹ 35720209276062 and/or IMSI² 310410155988969; (2) bearing IMEI 35324410436065 and/or IMSI 310410251030203; (3) bearing IMEI 35390959611806 and/or IMSI 310280022356011; (4) bearing IMEI 35325307771107 and/or IMSI 310410861866143; and (5) bearing IMEI 35355956330430 and/or IMSI 310280074221474. Law enforcement agents executing the requested warrant may examine cellphones found within the Subject Premises only to the extent necessary to view the IMEI and/or IMSI. Law enforcement may not otherwise examine the contents of any cellphones without further judicial authorization.

¹ “IMEI,” or International Mobile Equipment Identity, is a unique number used to identify certain types of cellphones.

² “IMSI,” or International Mobile Subscriber Identity, is a unique number that mobile network operators use to recognize individual subscribers.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN THE MATTER OF THE SEARCH : Hon. Leda Dunn Wettre, U.S.M.J.
OF THE PREMISES LOCATED AT :
[REDACTED] : Mag. No. 24-mj-13089 (LDW)
[REDACTED] FORT LEE, NJ 07024, AS :
MORE PARTICULARLY DESCRIBED : SEALING ORDER
IN ATTACHMENT A :

Upon the application of the United States of America, by Philip R. Sellinger, United States Attorney for the District of New Jersey (Francesca Liquori, Assistant U.S. Attorney, appearing) for a search warrant and an order sealing the search warrant issued on this date, the application and attached affidavit in support of such warrant, and the inventory and property receipt and other related documents, except for a copy of the search warrant and a copy of the property receipt to be served at the time of the search; and for good cause shown,

IT IS ON THIS 17th day of May, 2024,

ORDERED that the search warrant, the application and affidavit in support of the search warrant, property receipt, inventory, and all other related documents, are sealed until otherwise ordered by the Court, except that: (i) a copy of the search warrant and property receipt to be served at the time the search is executed, and (ii) the Government may, without further order of this Court, disclose these materials in furtherance of its discovery and disclosure obligations in any prosecutions related to this matter.

/s Hon. Leda Dunn Wettre (By Agent with Authorization)

Hon. Leda Dunn Wettre
United States Magistrate Judge